

**IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JULIA SANCHEZ,

Plaintiff,

V.

**HARD ROCK CAFÉ INTERNATIONAL
(STP), INC., HARD ROCK CAFÉ
INTERNATIONAL, INC., and HARD ROCK
CAFÉ INTERNATIONAL (S.A.), INC.,**

Defendant.

§ §

Civil Action No. 3-18-cv-02113-N

**DEFENDANT HARD ROCK CAFÉ INTERNATIONAL (STP), INC.'S
INITIAL DISCLOSURES**

TO: PLAINTIFF Julia Sanchez, by and through her counsel of record, Aaron A. Herbert and Marissa A. Maggio, The Law Firm of Aaron A. Herbert, 8330 LBJ Freeway, Suite 700, Dallas, Texas 75243.

COMES NOW Defendant Hard Rock Café International (STP), Inc., and, pursuant to Federal Rule of Civil Procedure 26(a)(1), files and serves this, its Initial Disclosures to Plaintiff.

Respectfully submitted,

BY: /s/ Clark S. Butler
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Attorney -in- Charge
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CLARK S. BUTLER
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THE MILLER LAW FIRM
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Dallas, Texas 75219
Phone 469-916-2552
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**ATTORNEYS FOR DEFENDANT HARD
ROCK CAFÉ INTERNATIONAL (STP), INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all known counsel of record, pursuant to Fed. R. Civ. P. 5, on this 29th day of April, 2019, via electronic filing as follows:

Aaron A. Herbert
Marissa A. Maggio
The Law Firm of Aaron A. Herbert
8330 LBJ Freeway, Suite 700
Dallas, Texas 75243
Counsel for Plaintiff

/s/ Clark S. Butler
CLARK S. BUTLER

INITIAL DISCLOSURES

(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

Employees, Representatives, and
Custodians of Records for
Hard Rock Café International (STP), Inc.
c/o The Miller Law Firm
3811 Turtle Creek Blvd., Suite 1950
Dallas, Texas 75219
469.916.2552

These persons may have knowledge regarding the policies and procedures of the San Antonio location at the time of the subject incident.

Julia Sanchez
c/o The Law Firm of Aaron A. Herbert
8330 LBJ Freeway, Suite 700
Dallas, Texas 75243
214.347.4259

Ms. Sanchez is the Plaintiff in this matter.

(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

Defendant will supplement.

(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

Defendant is not seeking economic damages at this time, but reserves the right to challenge any computation of damages presented by Plaintiff. Defendant reserves the right to supplement within the time limitations provided by the Court, or alterations thereto, or by any agreements between the parties.

(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made the satisfy the judgment.

Defendant will supplement.